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Attorney for Defendant
AGUSTIN GONZALEZ

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 24-CR-00012-KJM
)	
Plaintiff,)	
)	
v.)	[PROPOSED] ORDER REGARDING
)	AMENDING SPECIAL CONDITIONS OF
)	PRETRIAL RELEASE
)	
AGUSTIN GONZALEZ,)	
)	Date: n/a
)	Time: n/a
)	Judge: Honorable Chi Soo Kim
Defendants.)	
)	

Defendant, AGUSTIN GONZALEZ, by and through counsel, seeks to amend the Court's previously issued Pretrial Release Order issued by the Honorable Carolyn Delaney on January 18, 2024.

United States Pretrial Services officer, Renee Basurto, recently contacted counsel and inquired about amending Mr. Gonzalez's release conditions, specifically condition twelve. AUSA Cameron Desmond indicated that she had no objection to that request. On Mr. Gonzalez's behalf, counsel humbly requests that condition #12 be modified to include the italicized language set forth in Exhibit A – ***"CURFEW: You must remain inside your***

1 *residence every day from 10:00pm to 5:00am, or as adjusted by the pretrial services officer*
2 *for medical, religious services, employment or court-ordered obligations.*

3 Attached as Exhibit A to this pleading are the new Amended Special Conditions of
4 Release. Kyle Knapp, attorney for defendant, AGUSTIN GONZALEZ, asks that the attached
5 Amended Special Conditions of Release be adopted.

6 All other terms and conditions of release would remain in place.

7 Dated: July 16, 2024

/s/ Kyle R. Knapp
KYLE KNAPP
Attorney for Defendant
AGUSTIN GONZALEZ

10 **[PROPOSED] ORDER**

11 The request to amend Mr. GONZALEZ's release conditions is GRANTED, and the
12 Amended Special Conditions of Release for Mr. GONZALEZ are hereby adopted.
13

14 **IT IS SO ORDERED.**

15 Dated: July 17, 2024

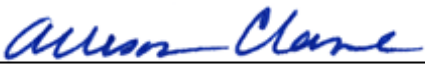
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18 ALLISON CLAIRE
19 UNITED STATES MAGISTRATE JUDGE
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EXHIBIT A

AMENDED SPECIAL CONDITIONS OF RELEASE

Re: Gonzalez, Agustin
No.: 2:24-cr-00012-TLN-3
Date: July 16, 2024

1. You must report to and comply with the rules and regulations of the Pretrial Services Agency;
1. You must report in person to the Pretrial Services Agency on the first working day following your release from custody;
2. You must reside at a location approved by the pretrial services officer and not move or absent yourself from this residence for more than 24 hours without the prior approval of the pretrial services officer;
3. You must cooperate in the collection of a DNA sample;
4. You must restrict your travel to the Eastern District of California unless otherwise approved in advance by the pretrial services officer;
5. You must not apply for or obtain a passport or any other travel documents during the pendency of this case;
6. You must not possess, have in your residence, or have access to a firearm/ammunition, destructive device, or other dangerous weapon; additionally, you must provide written proof of divestment of all firearms/ammunition currently under your control;
7. You must not use or possess any narcotic drug or other controlled substance without a prescription by a licensed medical practitioner; and you must notify Pretrial Services immediately of any prescribed medication(s). However, medicinal marijuana prescribed and/or recommended may not be used;
8. You must not associate or have any contact with co-defendants unless in the presence of counsel or otherwise approved in advance by the pretrial services officer;
9. You must report any contact with law enforcement to your pretrial services officer within 24 hours
10. You must participate in the following location monitoring program component and abide by all the requirements of the program, which will include having a location monitoring unit installed in your residence and a radio frequency transmitter device attached to your person. You must comply with all instructions for the use and operation of said devices as given to you by the Pretrial Services Agency and employees of the monitoring company. You must pay all or part of

1 the costs of the program based upon your ability to pay, as determined by the pretrial services
2 officer; and

3 ***11. CURFEW: You must remain inside your residence every day from 10:00pm to 5:00am, or as***
4 ***adjusted by the pretrial services officer for medical, religious services, employment or court-***
5 ***ordered obligations.***
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